

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JIMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., S.A.)

Defendants.

Civil Action No.: 04-10501 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights
Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., S.A.)

Defendants.

Civil Action No.: 04-10477 (PBS)

STONINGTON PARTNERS, INC., a
Delaware Corporation, STONINGTON
CAPITAL APPRECIATION 1994 FUND
L.P., a Delaware Partnership and
STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., S.A.)

Defendants.

Civil Action No.: 04-10411 (PBS)

**DEXIA'S MOTION SEEKING LEAVE TO FILE A REPLY
MEMORANDUM IN SUPPORT OF ITS MOTION TO COMPEL A COMPLETE
RESPONSE TO ITS SECOND SET OF INTERROGATORIES TO
BAKER, FILLER AND STONINGTON PLAINTIFFS**

Dexia Bank Belgium ("Dexia") respectfully seeks leave to file a reply memorandum in support of its Motion to Compel a Complete Response to its Second Set of Interrogatories to Baker, Filler, and Stonington Plaintiffs. Dexia seeks leave to file this reply, attached hereto as Exhibit A, in order to respond to certain specific points raised by KPMG, a non-party to these actions, in their opposition papers that were not addressed in Dexia's original motion.

Dated: July 14, 2006

Respectfully submitted,

MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO

By: /s/ Breton Leone-Quick
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Counsel for Dexia Bank Belgium

Local Rule 7.1(A)(2) Certification

Counsel for Dexia hereby certifies that, pursuant to Local Rule 7.1(A)(2), they have conferred in good faith with counsel for Plaintiffs who took no position with respect to this motion. Counsel for Dexia also conferred in good faith with counsel for KPMG who also took no position with respect to the filing of this motion.

Certificate of Service

I, Breton Leone-Quick, hereby certify that this document, along with its exhibit, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on July 14, 2006.

/s/ Breton Leone-Quick

Dated: July 14, 2006